UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT

TEMPLE UNIVERSITY HOSPITAL, INC.)
Petitioner/Cross-Respondent)
V.)) Nos. 18-1150, 18-1164
NATIONAL LABOR RELATIONS BOARD)
Respondent/Cross-Petitioner)
and)
)
TEMPLE ALLIED PROFESSIONALS,)
PENNSYLVANIA ASSOCIATION OF STAFF)
NURSES AND ALLIED PROFESSIONALS)
Intervenor)
	_)

UNOPPOSED MOTION OF INTERVENOR FOR ARGUMENT TIME

To the Honorable, the Judges of the United States Court of Appeals for the District of Columbia Circuit:

Intervenor, Temple Allied Professionals, Pennsylvania Association of Staff
Nurses and Allied Professionals (PASNAP), by its counsel, respectfully moves the
Court to allocate 3 minutes of the Respondent/Cross-Petitioner's argument time to the
Intervenor in this matter.

- 1. On December 20, 2018, the Court set oral argument for Monday, February 25, 2019 at 9:30 a.m. (D.# 1765192).
- 2. On February 12, 2019, the Court allocated oral argument of 10 minutes to the Petitioner and 10 minutes to the Respondent. (D.#1773008)
 - 3. The Court did not allocate any argument time to the Intervenor.

USCA Case #18-1150 Document #1773327

Page 2 of 4

Filed: 02/13/2019

4. Jonathan Walters, Esq. wishes to argue briefly on behalf of the Intervenor.

5. On February 12, 2019, Julie Brock Broido, Esquire, the supervisory attorney for the Respondent in this case, has stated in writing that the National Labor Relations Board does not oppose this motion and will give the Intervenor three of its ten minutes of argument time.

6. On February 13, 2019, Shannon D. Farmer, counsel to Petitioner Temple University Hospital, Inc. indicated that she had not objection.

WHEREFORE, the Intervenor respectfully requests that the Court grant this unopposed motion and allocate three minutes of Respondent's argument time to Jonathan Walters on behalf of the Intervenor.

Respectfully submitted,

/s/ Claiborne S. Newlin Claiborne S. Newlin, Esq. Jonathan Walters MARKOWITZ & RICHMAN 123 S. Broad Street, Suite 2020 Philadelphia, PA 19109 Tel.: 215.875.3100 Fax: 215.790.0668

Fax: 215.790.0668 Attorneys for PASNAP

Dated: February 13, 2019

Filed: 02/13/2019

UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT

TEMPLE UNIVERSITY HOSPITAL, INC. Petitioner/Cross-Respondent)
V.) Nos. 18-1150, 18-1164
NATIONAL LABOR RELATIONS BOARD Respondent/Cross-Petitioner)))
and)
TEMPLE ALLIED PROFESSIONALS, PENNSYLVANIA ASSOCIATION OF STAFF NURSES AND ALLIED PROFESSIONALS Intervenor))))

CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rule of Appellate Procedure 27(d)(2), the Intervenor certifies that its motion contains 570 words of proportionally-spaced, 14-point type, and the word processing system used was Microsoft Word 2016.

/s/ Claiborne S. Newlin Claiborne S. Newlin, Esq. Jonathan Walters MARKOWITZ & RICHMAN 123 S. Broad Street, Suite 2020 Philadelphia, PA 19109 Tel.: 215.875.3100 Fax: 215.790.0668 Attorneys for PASNAP

Dated: February 13, 2019

UNITED STATES COURT OF APPEALS FOR THE DISTRICT OF COLUMBIA CIRCUIT

TEMPLE UNIVERSITY HOSPITAL, INC. Petitioner/Cross-Respondent)
V.) Nos. 18-1150, 18-1164
NATIONAL LABOR RELATIONS BOARD Respondent/Cross-Petitioner)
and)
TEMPLE ALLIED PROFESSIONALS,)
PENNSYLVANIA ASSOCIATION OF STAFF)
NURSES AND ALLIED PROFESSIONALS)
Intervenor)
	_)

CERTIFICATE OF SERVICE

I certify that on February 13, 2019, I electronically filed the foregoing motion with the Clerk of the Court for the U.S. Court of Appeals for the D.C. Circuit by using the appellate CM/ECF system. I further certify that I served the Motion on participants in this case through the CM/ECF system:

/s/ Claiborne S. Newlin Claiborne S. Newlin, Esq. Jonathan Walters MARKOWITZ & RICHMAN 123 S. Broad Street, Suite 2020 Philadelphia, PA 19109 Tel.: 215.875.3100 Fax: 215.790.0668 Attorneys for PASNAP

Dated: February 13, 2019